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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

SUSAN BITTER SMITH, Chairman
BOB STUMP
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Arizona Corporation Commission

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MAR 13 2015

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IN THE MATTER OF THE
APPLICATION OF ARIZONA PUBLIC
SERVICE COMPANY, PURSUANT TO
ARIZONA REVISED STATUTE § 40-
252, FOR AN AMENDMENT OF
ARIZONA CORPORATION
COMMISSION DECISION NO. 70850.

DOCKET NO. L-00000D-08-0330-00138

**APS'S POST-HEARING REPLY
BRIEF**

APS has demonstrated that the public interest would be served by granting its Application to Amend Arizona Corporation Commission Decision No. 70850 Regarding CEC 138 and Request for Extension of CEC Term ("Application to Amend"), including the corridor modification referred to as the "Revised ASLD Proposed Corridor" submitted by the State Land Department on March 6, 2015 and agreed to by pertinent parties. APS has demonstrated in its written filings and at the evidentiary hearing held on January 20 and 21, 2015 that the proposed amendments, as modified by the parties' agreement, and CEC term extension are reasonable and in the public interest.

1 Specifically, APS has demonstrated:

- 2 • A strong need exists for both the 500kV and 230kV circuits of this project
- 3 going forward;
- 4 • The proposed corridor modifications are environmentally compatible; and
- 5 • The proposed corridor modifications improve the ability of APS to obtain
- 6 necessary rights of way and improve the design and safety of the line.

7 As discussed in APS's Initial Post-Hearing Brief, the written record and
8 evidentiary hearing provide ample support for the requested amendments to CEC 138
9 and Arizona Corporation Commission Decision No. 70850.

10 All parties to these proceedings support the requested corridor modifications or
11 have no position on the requested modifications because they are not impacted by them.
12 *See* Staff's Closing Brief at 5:25-26, 6:3-5; ASLD Notice of Agreed "Revised ASLD
13 Proposed Corridor" and Request to Revise APS Application to Amend at 3:5-7; APS
14 Initial Post-Hearing Brief at 3:1-9; Post-Hearing Joint Statement of Position of Diamond
15 Ventures Inc. and City of Peoria in Lieu of Initial Brief at 4:21-5:2 and n.5.
16 Additionally, all parties support or have taken no position on the requested term
17 extension. *See* Staff's Closing Brief at 5:19-21; APS Initial Post-Hearing Brief at 3:9-
18 12; Post-Hearing Joint Statement of Position of Diamond Ventures Inc. and City of
19 Peoria in Lieu of Initial Brief at 4:21-5:2.

20 For these reasons, APS respectfully requests that the Administrative Law Judge
21 issue a recommended opinion and order that grants APS's Application to Amend as
22 modified by the parties' agreement to adopt the Revised ASLD Proposed Corridor that
23 is reflected on Exhibit A to APS's Initial Post-Hearing Brief and the ASLD's March 6,
24 2015 filing.

1 RESPECTFULLY SUBMITTED this 13th day of March 2015.

2
3 By: Melissa M. Krueger
4 Melissa M. Krueger
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6 Attorneys for Arizona Public Service
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8 ORIGINAL and thirteen (13) copies
9 of the foregoing filed this 13th day of
10 March 2015, with:

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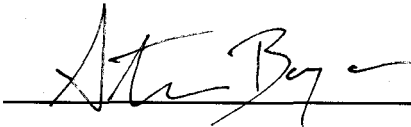
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